

EXHIBIT E

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SUSAN B. LONG, *et al.*

Plaintiffs,

v.

U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT, *et al.*

Defendants.

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) No. 1:14-CV-00109-JDB
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**DECLARATION OF JEFF WILSON
IN SUPPORT OF THE UNITED STATES DEPARTMENT OF HOMELAND
SECURITY'S MOTION FOR SUMMARY JUDGMENT**

I. INTRODUCTION

I, Jeff Wilson, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the Unit Chief of the Information Technology Management Unit (the "ITM Unit") within Enforcement and Removal Operations ("ERO") Law Enforcement and Systems Analysis ("LESA") at U.S. Immigration and Customs Enforcement ("ICE"). I have held this position (formerly known as the "Information Technology and Modernization Unit") since August 2010. I served as the Acting Chief for the Modernization Unit from December 2008 until accepting the position. Prior to joining ICE in 2007 as a Management and Program Analyst, I spent 16 years at the United States Treasury Department holding an array of positions in the budget and information technology fields. The LESA ITM Unit mailing address is 500 12th Street, S.W., STOP 5009, Washington, D.C. 20536-5009.

2. The LESA ITM Unit coordinates business side priorities and Information Technology (“IT”) project agreements supporting ICE’s objectives by developing new and modernizing existing technologies for ERO.

3. As the Unit Chief for the ITM Unit, my official duties and responsibilities include the general management, oversight, and supervision of the ITM Unit and coordination with the ICE Office of the Chief Information Officer. I manage and supervise a staff of ICE Information Technology Subject Matter Experts and Program Managers, who report to me regarding the advancement and progress of system updates and modernizations.

4. I make this declaration in support of ICE’s Motion for Summary Judgment in the above-captioned action. The statements contained in this declaration are based upon my personal knowledge, my review of documents kept by ICE in the ordinary course of business, and information provided to me by other ICE employees in the course of my official duties.

5. In my role as the Unit Chief for the ITM Unit, I am familiar with the following FOIA requests submitted by Susan Long and David Burnham on behalf of the Transactional Records Access Clearinghouse (TRAC) to ICE:

- a. FOIA request dated October 13, 2010 asking for “a complete set of documentation on the ‘Enforcement Integrated Database (EID).’”
- b. FOIA request dated October 18, 2010 asking for “a complete set of documentation on the ‘ICE Integrated Decision Support (IIDS) Database.’”
- c. FOIA request dated September 21, 2012 asking for the “current ‘snapshot’ of ENFORCE prepared for ICE’s Integrated Decision Support (IIDS) system.”
- d. FOIA request dated September 21, 2012 asking for records identifying any extracts and ‘snapshots’ prepared from the Enforcement Integrated Database

(EID) over the last 12 months, along with records relating to the frequency with which such extracts and snapshots have been prepared, who was responsible for preparing any snapshot or extract, the recipient(s) of that extracts/snapshots, as well as the EID system time required in their preparation during this period.

- e. FOIA request dated February 25, 2013 asking for the “current ‘snapshot’ of EID database prepared for CBP data warehouse.”
- f. FOIA request dated February 26, 2013 asking for the 1) the “current ‘snapshot’ of EID database prepared for EARM Data Mart” and the 2) “current ‘snapshot’ of EID database prepared for EID Data Mart.”

II. DESCRIPTION OF THE EID/IIDS DATA REPOSITORIES:

The Enforcement Integrated Database (EID) is owned and operated by ICE and is used primarily to support the law enforcement activities of certain Department of Homeland Security (DHS) components, including U.S. Immigration and Customs Enforcement (ICE) and U.S. Customs and Border Protection (CBP). EID is the common database repository for all records created, updated, and accessed by a number of software applications. These applications include the ENFORCE Apprehension Booking Module, EID Arrest Guide for Law Enforcement (EAGLE), ENFORCE Alien Detention Module (EADM), ENFORCE Alien Removal Module (EARM), electronic Travel Document (eTD), User Account Management (UAM), and the following Customs and Border Protection (CBP) systems - e3booking, e3biometric, e3assaults, e3prosecutions, e3OASISS. Collectively, these applications are referred to as the “ENFORCE/EAGLE applications.” EID and the ENFORCE/EAGLE applications capture and maintain information related to the investigation, arrest, booking, detention, and removal of

persons encountered during immigration and law enforcement investigations and operations conducted by ICE and CBP. EID provides users with the capability to access a person-centric view of the data using the ENFORCE/EAGLE applications. Users can also print reports, notices, and other documents containing EID data, which are used for criminal and administrative law enforcement purposes and typically are retained in criminal investigative files, detention files, and Alien Files (A-Files). Immigration-related forms generated by the system are also sent to courts and other agencies to support the advancement and adjudication of DHS and Department of Justice immigration cases before U.S. immigration courts. Forms and data may also be provided to the criminal courts of the United States. The EID is a 24x7 operational database with more than 55,000 users. EID houses data and business rules that are integrated with other systems through direct database connectivity or complex interfaces.

IIDS, or the ICE Integrated Decision Support System, contains a **subset** of the EID database repository that provides a continuously updated snapshot of selected EID data. It takes between 17 and 27 hours to update this snapshot; therefore, the update process is scheduled to run every 48 hours. The EID snapshot/extract provided to IIDS every 48 hours replaces the older snapshot/extract, and is not retained. Accordingly, a snapshot from the day of the subject FOIA request is not possible because the point-in-time version of the requested information is no longer available. The IIDS supports DHS requirements to query EID data for operational or executive reporting purposes. It is queried instead of the EID to protect the integrity of the live data held in the EID operational environment and to prevent the performance of EID and the ENFORCE applications from being diminished.